

**BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA  
DOCKET NO. 2021-153-S**

**Application of Palmetto Wastewater  
Reclamation, Incorporated for an  
Adjustment of Rates and Charges**

**FIRST INTERROGATORIES AND  
REQUESTS TO PRODUCE TO  
DEPARTMENT OF CONSUMER  
AFFAIRS**

**TO: ROGER P. HALL AND CONNOR J. PARKER, ATTORNEYS FOR THE  
DEPARTMENT OF CONSUMER AFFAIRS.**

**INSTRUCTIONS**

Palmetto Wastewater Reclamation, Inc., requests pursuant to S.C. Code Reg. 103-833 that the Department of Consumer Affairs (“DCA”) provide responses to the following interrogatories and requests for production to charles.terreni@terrenilaw.com and sellriott@elliottlaw.us within twenty (20) days of service of these requests. If you are unable to respond to any of the requests, or part or parts thereof, please specify the reason for your inability to respond and state what other knowledge or information you have concerning the unanswered portion.

As used in these requests, “identify” means, when asked to identify a person, to provide the full name, business title, address, and telephone number. As used in these requests, “address” means mailing address and business address. When asked to identify or provide a document, “identify” and “provide” mean to provide a full and detailed description of the document and the name and address of the person who has custody of the document. In lieu of providing a full and detailed description of a document, a copy of the document may be attached with the identity of the person who has custody of it. When the word “document” is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings,

publications, and tape recordings. "Person" includes any individual, firm, partnership, limited liability company, association, corporation, receiver, trustee, any group or combination acting as a unit, the State, any state agency, any instrumentality, authority, political subdivision, or municipality, or other entity. Wherever in this request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

**IT IS THEREFORE REQUIRED:**

1. Pursuant to S.C. Code Reg. 103-833 and SCRPC Rules 33 and 34, responses to interrogatories and requests for production shall be verified.
2. In addition to the signature and verification at the close of the responses, the witness(es), employee(s), contractor(s), or agent(s) responsible for the information contained in each response shall be indicated at the bottom of each response.
3. All information provided shall be provided in electronic form only unless otherwise requested. All information available in Excel spreadsheets shall be provided in Excel. All Excel spreadsheets shall be working copies with all formulas, links and calculations intact.
4. All electronic documents provided must be provided in native file format with all formulas, links and calculations intact. Responses containing .pdf documents must be searchable. Each electronic file must be clearly marked with the Response number.
5. Any inquiries or communications relating to questions concerning clarification of the information requested below should be directed to Charles L.A. Terreni, [charles.terreni@terrenilaw.com](mailto:charles.terreni@terrenilaw.com), and Scott Elliott [selliott@elliottlaw.us](mailto:selliott@elliottlaw.us).
6. That this entire list of requests be reproduced and included in front of each set of responses.
7. If the response to any request is that the information requested is not currently available, please advise so and state when the information requested will be available and provided. This statement is not a waiver of the deadline for all other responses.
8. This request is continuing and requires DCA to supplement or amend its responses as any additional information becomes available.
9. For every page produced that contains confidential information, the page is to be marked "CONFIDENTIAL" in the header. Any specific information which DCA designates as confidential information must also be marked by notation, highlighting, or other conspicuous means.

**1. INTERROGATORIES**

1. Please give the names and addresses of persons known to the parties or counsel to be witnesses concerning the facts of the case and indicate whether or not written or recorded statements have been taken from the witnesses and indicate who has possession of such statements.

2. Set forth a list of photographs, plats, sketches or other prepared documents in possession of the party that relate to the case.
3. Please provide contact names, phone numbers, and e-mail addresses of DCA personnel who will be responsible for coordinating the field audit(s) and other inquiries regarding the audit(s).
4. Please provide a list of the names of witness(es) DCA intends to call at the hearing in this matter and the subject matter to which each witness will testify.
5. List the names and addresses of any expert witnesses whom the party proposes to use as a witness at the trial of the case.

#### REQUESTS TO PRODUCE

- 1 Please provide copies of any substantive written correspondence, discovery requests and responses, from or to any other parties in this Docket.
- 2 The curriculum vitae of any expert witness DCA intends to call in this matter.
- 3 Copies of any documents responsive to Interrogatory no. 2

*s/ Charlie Terreni*

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